

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

IN RE:)	Chapter 11
)	
PASO DEL NORTE MATERIALS, LLC,)	Case No. 23-30252
)	
Debtor.)	

NOTICE OF APPEARANCE AND REQUEST FOR SPECIAL NOTICE

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE, THE UNITED STATES TRUSTEE, AND OTHER INTERESTED PARTIES:

PLEASE TAKE NOTICE that pursuant to Section 1109(b) of Title 11 of the United States Code (“Bankruptcy Code”) and Rules 2002, 3017, and 9010(b) of the Federal Rules of Bankruptcy Procedure (“Bankruptcy Rules”), Gordon & Rees hereby requests that all notices given or required to be given in this case be given to and served upon the undersigned at the following office, address, email and telephone number.

Megan M. Adeyemo (TX Bar No. 24099595)
GORDON & REES
2200 Ross Avenue, Suite 3700
Dallas, TX 75201
Telephone: (214) 231-4660
Facsimile: (214) 461-4053
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Neither this Request for Special Notice nor any subsequent appearance, pleading, claim, proof of claim, document, suit, motion nor any other writing or conduct shall constitute a waiver of Mitsubishi HC Capital America Inc. (“Mitsubishi”) of any:

- (a) Right to have any and all final orders in any and all non-core matters entered only after *de novo* review by a United States District Court Judge or Bankruptcy Appellate Panel;
- (b) Right to trial by jury in any proceeding as to any and all matters so triable

therein, whether or not the same be designated legal or private rights, or in any case, controversy or proceeding related hereto, notwithstanding the designation *vel non* of such matters as “core proceedings” pursuant to 28 U.S.C. § 157(b)(2)(H), and whether such jury trial right is pursuant to statute or the United States Constitution;

(c) Right to have the reference of this matter withdrawn by the United States District Court in any matter or proceeding subject to mandatory or discretionary withdrawal; and

(d) Other rights, claims, actions, defenses, setoffs, recoupments or other matters to which Mitsubishi is entitled under any agreement or at law or in equity or under the United States Constitution.

All of the above rights are expressly reserved and preserved unto Mitsubishi without exception, and with no purpose of confessing or conceding jurisdiction in any way by this filing or by any other participation in this matter.

PLEASE TAKE FURTHER NOTICE that pursuant to Section 1109(b) of the Bankruptcy Code, the foregoing request includes not only the notices and papers referred to in the rules specified above, but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, plan, disclosure statement, complaint, demand, answers or reply papers, made by the debtor or any third party in the bankruptcy case or any adversary proceedings or contested matters herein, whether formal or informal, written or oral, transmitted or conveyed by mail, delivery, telephone, telecopy, facsimile, electronic mail, personal delivery or other means.

Date: August 1, 2023

GORDON & REES

By: /s/ Megan M. Adeyemo
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